



*United States Attorney
Eastern District of New York*

RAT
F.#2011R01364

*610 Federal Plaza
Central Islip, New York 11722*

August 31, 2012

By ECF and Personal Service

Anthony J. Colleluori, Esq.
The Law Offices of Anthony J. Colleluori
68 South Service Road, Suite 100
Melville, NY 11747

Re: United States v. Lutful Chowdhury
Criminal Docket No. 12-CR-0143 (LDW)

Dear Mr. Colleluori:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, please find enclosed with this letter supplemental discovery in the above-referenced matter. Please also consider this letter to be the government's request for reciprocal discovery.

1. Statements of the Defendant

Attached are copies of the defendant's grand jury testimony in a state court grand jury proceeding, page numbered 2 through 12.

2. Documents and Tangible Objects

Attached are copies of the federal search warrant and affidavit pertaining to the computers seized from Aim Pharmacy in April 2010, Bates numbered 1 through 69. The underlying state court search warrants pertaining to the underlying state court action are attached to the federal search warrant affidavit and Bates numbered 18 through 69. Also provided to the defense are copies of the hard drives from the computers seized from Aim Pharmacy, which are contained on 34 computer disks.

3. The Defendant's Required Disclosures

The government hereby requests reciprocal discovery under Rule 16(b) of the Federal Rules of Criminal Procedure. The government requests that the defendant allow inspection and copying of (1) any books, papers, documents, photographs, tapes,

tangible objects, or copies or portions thereof, which are in the defendant's possession, custody or control, and which the defendant intends to introduce as evidence or otherwise rely on at trial, and (2) any results of reports or physical or mental examinations and of scientific tests or experiments made in connection with this case, or copies thereof, which are in the defendant's possession, custody, or control, and which the defendant intends to introduce as evidence or otherwise rely on at trial or which were prepared by a witness whom the defendant intends to call at trial.

The government also requests that the defendant disclose prior statements of witnesses who will be called by the defendant to testify. See Fed. R. Crim. P. 26.2. In order to avoid any unnecessary delay, we request that you have copies of these statements available for production to the government no later than the commencement of trial.

The government also requests that the defendant disclose a written summary of testimony the defendant intends to use under Rules 702, 703, and 705 of the Federal Rules of Evidence. The summary should describe the opinions of the witnesses, the bases and reasons for those opinions, and the witnesses' qualifications.

If you have any questions or further requests, please do not hesitate to contact me.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: _____
Raymond A. Tierney
Assistant United States Attorney
(631) 715-7849

Enclosures

CC: Clerk of Court (LDW)
Eastern District of New York (w/o enclosures)